

Chapter 3

Registration and Termination

The Political Reform Act requires most lobbying filers to submit registration statements that identify persons engaged in lobbying activity. This chapter provides guidance on when the forms are due and how to complete them. All registration forms are filed with the Secretary of State, either electronically, in paper format, or both. (See Chapter 2.) Each legislative session, the Secretary of State's office publishes *The Directory of Lobbyists, Lobbying Firms & Lobbyist Employers* based on information provided by lobbying firm and lobbyist employer registration statements. Registration information is also available online through the Secretary of State's website at www.ss.ca.gov.

Name Identification Requirements

The Act requires disclosure of the names of entities that engage in lobbying activity. If a lobbyist employer is a business entity with subsidiaries, the name of the subsidiaries may be required to be separately identified along with the corporate parent's name. This manual can not address all of the different relationships of affiliated entities. Following is a selected summary of Commission advice. Lobbyist employers are encouraged to contact the FPPC for specific guidance.

Examples *A corporation and its subsidiary both make payments to a lobbying firm; the name of the filer should be listed as: ABC Company and its affiliate, XYZ subsidiary.*

A lobbying firm represents the lobbying interests of a corporation and its subsidiary, and each entity provides direction to the lobbying firm. The corporation makes all of the payments to the lobbying firm. The name

of the filer should be listed as: ABC Company and its affiliate, XYZ subsidiary.

A corporation has several subsidiaries. The corporation, alone, directs and controls the lobbying activity and makes all payments to the lobbying firm. The subsidiaries are not involved with lobbying activity nor do they make payments to the lobbying firm. Even though the subsidiaries may benefit from the lobbying firm's services, the name of the filer should be listed as: ABC Corporation. The subsidiaries are not required to be identified.

A corporation makes payments to a lobbying firm. A subsidiary of the corporation makes payments to a different lobbying firm. The lobbying activities of the corporation and the subsidiary are independent. The corporation does not pay for the subsidiary's activities or control its lobbying activities. The corporation is not required to identify the name of the subsidiary on its reports, nor is the subsidiary required to identify the name of the parent corporation on its reports.

Filing Electronically or Online

When a registration statement is being filed for the first time, no electronic filing of the form is required. However, if the filer is renewing or amending the registration, or filing a termination statement, and was required to file statements electronically, the form must be filed electronically, as well as on paper. (See Chapter 2 to determine if you are required to file electronically.)

Registration & Certification Statements

The law requires all lobbying firms to register, along with all lobbyist employers who employ in-house lobbyists. Lobbyists must file certification papers. Registration and certification are required when the filer first qualifies as a firm, employer, or lobbyist, *and* at the beginning of each legislative session. Only \$5,000 filers do not have to file registration or certification forms. All registration and certification forms require persons to disclose their names and addresses. This chapter reviews the sections of the forms that prompt the most questions from filers.

<u>Filer</u>	<u>Form</u>
Lobbyist	604
Lobbying Firm	601
Lobbyist Employer (with in-house lobbyist)	603
Lobbyist Employer (with lobbying firm)	602
All (amending a Form 601, 603, or 602)	605

All lobbyists must complete Form 604, Lobbyist Certification Statement. All lobbying firms file Form 601, Lobbying Firm Registration Statement. Lobbyist employers that employ an in-house lobbyist file Form 603, Lobbyist Employer Registration Statement, and lobbyist employers that contract with a lobbying firm complete Form 602, Lobbying Firm Authorization Statement. A lobbyist employer may be required to file both Form 603 and Form 602 if the lobbyist employer employs both an in-house lobbyist and contracts with a lobbying firm.

Registration statements must be verified and signed. Lobbyists must verify the Form 604. An individual must be designated on the lobbying firm's registration statement, Form 601, as the responsible officer of the firm, and this individual must verify the lobbying firm's reports. In the case of a lobbyist employer/lobbying coalition, the verification must be signed by a responsible officer, or by an attorney or a certified public accountant who acts as an agent for the lobbyist employer/lobbying coalition.

Lobbyist Certification Statement, Form 604

Lobbyists file the Lobbyist Certification Statement, Form 604. An individual who qualifies as a lobbyist must complete this form which will be filed along with the registration or amendment to registration form submitted by his or her lobbying firm or lobbyist employer/lobbying coalition, whichever is applicable. A recent photograph of the lobbyist's head and shoulders along with a \$25 registration fee payable to the Secretary of State are required. The Secretary of State will not accept photographs delivered by diskette. The photograph must be recent and of professional quality.

Filing Deadlines:

New Lobbyist:

- Within 10 days of qualifying as a lobbyist.

Lobbyist Renewing Certification:

- Between November 1 and December 31 of each even-numbered year.

Examples *Susan Gomez is hired by a lobbyist employer to perform duties as an in-house lobbyist. Susan must complete a Lobbyist Certification Statement, Form 604. Her employer will submit this form along with her picture and a \$25 payment to the Secretary of State. The employer must file a Form 605, Amendment to Registration Statement, to indicate Susan as a new in-house lobbyist.*

Al Johnson is promoted to become the first lobbyist for his employer. Al must complete a Lobbyist Certification Statement, Form 604. The employer must submit this form along with Al's picture and a \$25 payment to the Secretary of State. The employer must file the Lobbyist Employer Registration Statement, Form 603, to indicate that the company has qualified as a lobbyist employer and that Al Johnson has been employed to lobby on its behalf.

Lobbyist Ethics Orientation Course

All lobbyists are required to attend a lobbyist ethics course as part of the registration process. The course is conducted by the Assembly Legislative Ethics Committee and the Senate Committee on Legislative Ethics. To make reservations for the ethics course, call (916) 324-6929.

The Legislature will notify lobbyists of the course dates, and will provide a certificate upon completion of the course.

A lobbyist must file a conditional certification statement, Form 604, if he or she has not taken the course within the previous 12

months. The validity period of the conditional certification is determined by whether the lobbyist is renewing the certification or filing his or her first certification.

- New lobbyists must take the course within 12 months after registering as a lobbyist.
- Lobbyists who were registered in the prior legislative session, but have not taken the course in the 12 months prior to renewing their certification, must take the course by June 30 of the following year.

Examples *Susan White is a new lobbyist. She did not lobby in the 2003-2004 Legislative Session. Susan begins lobbying activities on September 1, 2005. She must take the course before September 1, 2006.*

Margaret Johnson was a registered lobbyist in the 2003-2004 Legislative Session and took the course on March 5, 2004. Margaret renewed her certification for the 2005-2006 Legislative Session in December 2004. Her certification is valid throughout the 2005-2006 session.

Larry Colfax was a registered lobbyist during the 2003-2004 Legislative Session and took the course on December 10, 2002. Larry may begin lobbying activities in the 2005-2006 Legislative session. However, his certification is conditional and he must take the course by June 30, 2005.

Quick TIP Failure to take the course at the times prescribed will void the conditional certification. Once voided, an individual is prohibited from acting as a lobbyist until he or she has completed the ethics training course and has filed an amended certification statement indicating the date the course was taken. The FPPC may not grant waivers to the ethics training requirement.

How to Complete Form 604

The Form 604 is an identification form that contains the lobbyist's name, address, telephone number, and name of his or her lobbying firm or lobbyist employer/lobbying coalition. The date the individual qualified as a lobbyist must be provided only on the initial statement; it is not required on renewals. The paper version of the report must be verified and signed by the lobbyist. No other individual may sign Form 604 on behalf of the lobbyist.

Part II. Agencies Lobbied

If the lobbyist will not be lobbying all the agencies listed on the Lobbyist Employer or Lobbying Firm Registration Statement (Form 603 or 601, respectively) filed by his or her employer or firm, check the second box, indicate if the lobbyist will be lobbying the State Legislature, and specify the state agencies to be lobbied.

Form 604 Lobbyist Certification Statement	
II. AGENCIES LOBBIED	
Check one box:	
<input type="checkbox"/> I will lobby the agencies identified on the Lobbyist Employer or Lobbying Firm Registration Statement (Form 601/603) and subsequent amendments.	
<input checked="" type="checkbox"/> I will only lobby the agencies identified below:	
Will you lobby the State Legislature?	State Agencies: <u>Department of Education</u>
<input checked="" type="radio"/> Yes <input type="radio"/> No	

QuickTIP The lobbyist gift limit and contribution restrictions apply to agencies lobbied by the lobbyist. (See Chapter 7.)

Questions and Answers

- Q. *How frequently are the ethics courses held?*
- A. Because there is no set schedule, the number of ethics courses conducted will vary from year to year. Contact one of the Legislature's ethics committees, or visit the FPPC's website at www.fppc.ca.gov, click on "Lobbyists," then click on "Ethics Course" for information.

- Q. *Is a lobbying firm or a lobbyist employer/lobbying coalition required to pay the \$25 registration fee when it hires a lobbyist who has been previously registered with another lobbying firm or lobbyist employer/lobbying coalition?*
- A. Yes. Contact the Secretary of State to determine if a new photograph is required.

Lobbying Firm Registration Statement, Form 601

An individual or business entity that qualifies as a lobbying firm must register within 10 days of qualifying as a lobbying firm.

Each lobbying firm must renew its registration between November 1 and December 31 of each even-numbered year. If the registration is not renewed, the lobbying firm will be automatically terminated.

Registration and renewal of registration requirements may include:

- Completion of Form 601;
- Submission of Form 602 completed by each lobbyist employer that contracts with the lobbying firm for lobbying services;
- Submission of Form 604 completed by each partner, owner, officer, or employee of the lobbying firm who qualifies as a lobbyist;
- A recent photograph of each lobbyist picturing only the lobbyist's head and shoulders; and
- A \$25 registration fee payable to the Secretary of State for each of the firm's lobbyists. Payment is required at time of filing.

QuickTIP A lobbying firm is not required to register a client that does not pay the firm (e.g., pro-bono services).

How to Complete Form 601

The Lobbying Firm Registration Statement provides identifying information about the lobbying firm and its clients. Enter the date qualified as a lobbying firm only on an initial registration. The qualification date is not necessary on subsequent renewals.

Form 601 Lobbying Firm Registration Statement		
II Lobbyist Employers • Use Section A to report each client with whom your firm has a direct contract to provide lobbying services. • Use Section B to report lobbying firms with which your firm subcontracts to provide lobbying services and the clients on whose behalf your firm will lobby. • Attach a Form 602 for each person identified in Section A or B.		
SECTION A		
Employer's Name, Address and Telephone Number City of Rolling Hills Estates 4045 Palos Verdes Drive North Rolling Hills Estates, CA 90274 (310) 377-1577	Effective Date 1/1/05	Period of Contract 2005/2006
Agencies to be Lobbied Legislature Dept. of Housing and Community Development Governor Dept. of Parks and Recreation	Description of Employer's Lobbying Interests Government	
Employer's Name, Address and Telephone Number California Electricity Distributors 555 Capitol Mall, Suite 900 Sacramento, CA 95814 (916) 441-5500	Effective Date 1/1/05	Period of Contract 2005
Agencies to be Lobbied Legislature Public Utilities Commission Governor	Description of Employer's Lobbying Interests Regulation of Utilities	

Quick TIP When reporting the names of lobbyists, do not list any individual who is separately registered as a lobbying firm or who is employed by a lobbying firm with which this firm contracts.

Quick TIP A partner, owner, or officer of the lobbying firm must be designated to be responsible for filing statements and reports and keeping records. An individual contract lobbyist filing the Form 601 as a lobbying firm is the responsible officer.

Part II. Lobbyist Employers

Under "Agencies to be Lobbied," list each state office (including the Governor's office, if applicable), department, division, bureau, board, or commission the lobbyist employer/lobbying coalition will attempt to influence. Do not include the courts, or federal or local agencies. It is permissible to list "all state agencies." In addition, provide a description of the lobbying interests of the lobbyist employer/lobbying coalition.

Example ZB Corporation develops, manufactures, and distributes pharmaceuticals. The description should state "legislation relating to the development, manufacturing, and distribution of pharmaceuticals." It is not sufficient to describe the corporation's lobbying interests as "legislation relating to business" or "health care."

A lobbying firm that contracts to lobby for a client of another lobbying firm must identify both the subcontracting lobbying firm and the client(s)/employer(s) on whose behalf the firm will lobby.

Form 601		
SECTION B -- Subcontracted Clients		
Name, Address and Telephone Number of Subcontracting Lobbying Firm: Alvarez, Greene, Ho, and Douglas 1127 11th Street, Suite 1020 Sacramento, CA 95814 (916) 441-6010		
Effective Date of Contract 1/1/05	Period of Contract 2005	
Name, Address and Telephone Number of Client on Whose Behalf Your Firm will Lobby: Four Mesas Municipal Water District 5000 Indio Blvd. Indio, CA 92203 (760) 861-1220		
Agencies to be Lobbied Legislature Governor	Dept. of Water Resources	Description of Client's Lobbying Interests Water Rights

Questions and Answers

- Q. May an entity or individual register as a lobbying firm if it intends to lobby but does not have a client at the time of registration?
- A. Yes. If the firm subsequently never engages in lobbying activity, it should file a Notice of Withdrawal, Form 607.
- Q. If the lobbying firm intends to lobby all state agencies, may it declare "All State Agencies" under "Agencies to be Lobbied," or must it itemize each agency?
- A. In lieu of listing every state agency, the lobbying firm may declare that all state agencies will be lobbied. Remember, this means that the gift limits and contribution prohibitions will apply to all state agency officials and all state candidates and officeholders. (See Chapter 7.)

- Q. *If the responsible officer of the lobbying firm changes, must the lobbying firm amend its registration to indicate the new responsible officer?*
- A. Yes. The registration must be amended within 20 days of the change.
- Q. *I am a lobbyist and will lobby for clients of my employer, Capital Services, a lobbying firm. I will also be paid directly to lobby on behalf of a client of my former lobbying firm, Communications, Inc. How do I register?*
- A. You must file as a separate lobbying firm and disclose, as a subcontractor, all the clients for whom you will lobby, including those on behalf of your current employer. Complete Lobbying Firm Registration Statement, Form 601, and include your Lobbyist Certification Statement, Form 604. As a subcontractor, identify in Section B of the Form 601 all clients for whom you will lobby. Include a Form 602 completed by Capital Services identifying the clients for whom you will lobby on behalf of that firm and another Form 602 completed by Communications, Inc., identifying the client for whom you will lobby on its behalf.

Lobbying Firm Activity Authorization, Form 602

Each client that retains a lobbying firm must complete a Lobbying Firm Activity Authorization, Form 602, to authorize the lobbying firm to lobby on its behalf. The lobbying firm must submit the Form 602 along with its Lobbying Firm Registration Statement, Form 601, or its Amendment to Registration, Form 605.

A lobbying firm that subcontracts clients to another lobbying firm must complete Form 602 and identify the names of the subcontracted client(s). It is not required to complete the “Nature and Interests” section for the subcontracted client(s).

Example Capital Watch, a lobbying firm, has a client, Silo Manufacturers of California (SMC). Capital Watch wishes to subcontract this client to Meyers & Nguyen, another lobbying firm. Before Meyers & Nguyen may begin lobbying on behalf of SMC, Capital Watch must complete a Form 602, signed by its responsible officer, identifying SMC as the subcontracted client and authorizing Meyers & Nguyen to lobby on behalf of SMC.

How to Complete Form 602

Nature and Interests of Lobbyist Employer

Provide a description of the lobbying interests of the lobbyist employer/lobbying coalition.

Example A trade association that represents electricity distributors will complete C. 1. A trade association that represents only one segment of an industry should complete C. 1. and 2. For example, an association representing insurance companies that sell only automobile policies may identify in section C. 1., “insurance,” and identify in C. 2., “automobile insurance policies.”

When listing the nature and interests of the filer, an association with fewer than 50 members must also provide the names of all members. Affiliated entities must report the nature and interests of all entities that comprise the lobbyist employer. (See 3-1.)

Form 602 Lobbying Firm Activity Authorization	
Nature and Interests of Lobbyist Employer	
Check one box only:	
<input type="checkbox"/> INDIVIDUAL (Complete only Parts A and E)	<input type="checkbox"/> BUSINESS ENTITY (Complete only Parts B and E)
<input checked="" type="checkbox"/> INDUSTRY, TRADE OR PROFESSIONAL ASSN. (Complete only Parts C and E)	<input type="checkbox"/> OTHER (e.g., lobbying coalition) (Complete only Parts D and E)
A. Individual 1. Name and address of employer (or principal place of business if self-employed):	2. Description of business activity in which you or your employer are engaged:
B. Business Entity Description of business activity in which engaged:	
C. Industry, Trade or Professional Association	
1. Description of industry, trade or profession represented: Electricity Distributors	2. Specific description of any portion or faction of the industry, trade, or profession which the association exclusively or primarily represents:
3. Number of members in association (check appropriate box) <input type="checkbox"/> 50 OR LESS (provide names of all members on an attachment.) <input checked="" type="checkbox"/> MORE THAN 50	

Lobbyist Employer and Lobbying Coalition Registration Statement, Form 603

An individual, business entity, organization, or lobbying coalition that has an in-house employee who qualifies as a lobbyist must register with the Secretary of State within 10 days of qualifying as a lobbyist employer.

Each registered lobbyist employer/lobbying coalition must renew its registration between November 1 and December 31 of each even-numbered year. If the registration is not renewed, the lobbyist employer/lobbying coalition will automatically be terminated.

Registration and renewal of registration requirements include:

- Completion of the Form 603;
- Submission of a Form 604 completed by each partner, owner, officer, or employee who qualifies as an in-house lobbyist;
- Submission of a recent photograph of only the lobbyist's head and shoulders; and
- A \$25 registration fee payable to the Secretary of State for each individual who qualifies as an in-house lobbyist. Payment is required at time of filing.

QuickTIP A lobbyist employer that **only** contracts with a lobbying firm, including an individual contract lobbyist, must complete the Lobbying Firm Authorization Statement, Form 602, and does not complete the Lobbyist Employer Registration Statement, Form 603.

QuickTIP A registered lobbyist employer that employs an in-house lobbyist and **also** contracts with a lobbying firm is required to complete the Lobbying Firm Activity Authorization, Form 602, for the lobbying firm.

How to Complete Form 603

If this is an initial registration, enter the date qualified as a lobbyist employer/lobbying coalition.

List the full name of each in-house employee lobbyist and of each lobbying firm, if any, with which the employer or coalition contracts.

Part II. State Agencies Whose Actions You Will Attempt to Influence

List each state office, (including the Governor's office, if applicable), department, division, bureau, board, or commission the lobbyist employer/lobbying coalition will attempt to influence. Do not include the courts, or federal or local agencies. It is permissible to list "all state agencies."

Form 603 Lobbyist Employer and Lobbying Coalition Registration Statement

If List Below the State Agencies Whose Actions you Will Attempt to Influence

• Will you attempt to influence the State Legislature? ☒ Yes ☐ No

Governor	
Dept. of Housing & Community Development	
Dept. of Parks & Recreation	

☐ If more space is needed, check box and attach continuation sheet.

Part III. Description of Lobbying Interests

Provide a description of the lobbying interests of the lobbyist employer/lobbying coalition and complete the Nature and Interests of the Filer section. Affiliated entities must report the nature and interests of all entities that comprise the lobbyist employer in Part B. (See 3-1.) When listing the nature and interests of an association with fewer than 50 members, the names of all members must be identified in Part C. A city, county, or other governmental agency will complete Part D.

Amendment to Registration, Form 605

Whenever any information reported on a registration statement changes, a Form 605 must be filed.

Deadlines for filing Form 605:

- If a lobbying firm is adding a new lobbyist employer/lobbying coalition, the amendment **must be filed prior to attempting to influence legislative or administration action on behalf of that lobbyist employer/lobbying coalition.**
- Within 20 days of any **other** change.

How to Complete Form 605

Adding a Lobbyist

Complete and file Form 605 and Form 604. A \$25 registration fee payable to the Secretary of State, and, if the lobbyist is newly qualified, a recent photograph (head and shoulders only) must also be submitted. A photograph is not necessary if the lobbyist is already registered for the current legislative session.

Form 605 Amendment to Registration	
I Description of Changes (See instructions on cover sheet and examples on the back of this page.)	
Check appropriate box(es)	
<input checked="" type="checkbox"/> Adding Lobbyist	<input type="checkbox"/> Lobbying Firm Deleting Lobbyist Employer
Andrew Puzankov	3 / 1 / 05
Name of Lobbyist	Effective Date
Attach Form 604	No attachment required

Deleting a Lobbyist

File Form 605 and Form 606, if a lobbyist is ceasing **all** activities as a lobbyist. If a lobbyist will no longer be employed by you, but is continuing activities as a lobbyist on behalf of others, a Form 606 is not required.

Lobbying Firm Adding Lobbyist Employer/Lobbying Coalition

File Form 605 (Parts I and II A) and Form 602.

Registered Lobbyist Employer Adding Lobbying Firm

File Form 605. The lobbying firm must also file a Form 605 and attach a Form 602 signed by a responsible officer of the lobbyist employer.

Lobbying Firm Subcontracting a Lobbyist Employer/Lobbying Coalition

A lobbying firm that is adding a client through a subcontract must complete Form 605 (Parts I and II B) and include a Form 602 signed by the subcontracting firm. The applicable registration forms related to the subcontract must be filed before lobbying may begin. The client is not required to file Form 602, either electronically or on paper.

(Example) *Capital Watch, a lobbying firm, has a client, Silo Manufacturers of California (SMC). Capital Watch wishes to subcontract this client to Meyers & Nguyen, another lobbying firm. Before Meyers & Nguyen may begin lobbying on behalf of SMC, Capital Watch must provide a Form 602 to Meyers & Nguyen identifying SMC as the subcontracted client and authorizing Meyers & Nguyen to lobby on behalf of SMC. Meyers & Nguyen must file a Form 605 indicating the new subcontracted client, along with the Form 602 from Capital Watch.*

Lobbying Firm Deleting a Lobbyist Employer/Lobbying Coalition

File Form 605. No attachment is necessary.

A Change in a Lobbying Firm's Designated Responsible Officer

File Form 605 and Part III of Form 601. No amendment is required when a lobbyist employer/lobbying coalition changes its designated responsible officer.

Lobbyist Employer Deleting a Lobbying Firm

When a registered lobbyist employer terminates a contract with a lobbying firm, a Form 605 must be filed by both the registered lobbyist employer and the lobbying firm. A lobbyist employer that is not registered (i.e., has no in-house lobbyists) is not required to file Form 605 when it terminates a contract with a lobbying firm.

Other Changes

An amendment is required when the agencies to be lobbied change.

If a change occurs in any of the information on the Form 604, an amended Form 604 must be filed.

Questions and Answers

- Q. *If the lobbyist employer or lobbying firm intends to lobby all state agencies, may it declare “All State Agencies” under “Agencies to be Lobbied,” or must it itemize each agency?*
- A. In lieu of listing every state agency, the lobbyist employer or lobbying firm may declare that all state agencies will be lobbied. Remember, this means that the gift limits and contribution prohibitions will apply to all state agency officials and all state candidates and officeholders. (See Chapter 7.)
- Q. *Is a lobbying firm or lobbyist employer/lobbying coalition required to pay the \$25 registration fee when it hires a lobbyist who has been previously registered with another lobbying firm, or lobbyist employer/lobbying coalition?*
- A. Yes.
- Q. *When is a registered lobbyist employer required to amend its registration to add a state agency to be lobbied?*
- A. Within 20 days of engaging in direct communication with officials of the agency for the purpose of influencing administrative action.
- Q. *Must a lobbyist employer list on its registration statements all departments under the umbrella of a state agency (e.g., Board of Nursing within the Department of Consumer Affairs)?*
- A. Yes, all departments that will be lobbied must be listed.

Notice of Termination, Form 606

If, during the legislative session, a lobbyist, lobbying firm, or registered lobbyist employer/lobbying coalition ceases all lobbying activity, a Notice of Termination, Form 606, must be filed. The Form 606 is not required if the lobbyist, lobbying firm, or lobbyist employer/lobbying coalition ceases all lobbying activity at the end of the legislative session.

Exceptions:

- Lobbyist employers/lobbying coalitions that only contract for the services of a lobbying firm do not file Form 606. The lobbying firm must file an Amendment to Registration Statement, Form 605, to delete the lobbyist employer.
- A lobbyist who changes employment and continues to lobby does not file a Form 606. The lobbying firm or lobbyist employer/lobbying coalition the lobbyist is leaving must file a Form 605 indicating the lobbyist's termination. The lobbyist's new lobbying firm or lobbyist employer/lobbying coalition must also file a Form 605 (or file a registration statement if it is not currently registered) adding the new lobbyist, along with a Form 604 signed by the lobbyist.

How to Complete Form 606

Form 606 must be filed within 20 days of ceasing all lobbying activity. A quarterly report(s) covering the period until the filing of the notice is required, unless lobbying ceases at the end of the legislative session.

Example *United Farmers of California ceased all lobbying activity on March 31, 2003, and filed its Report of Lobbyist Employer, Form 635, covering the period January 1, 2005, through March 31, 2005. United filed its Form 606 on April 30, 2005. It must file another Form 635, covering the period April 1, 2005, through the effective date of termination, April 30, 2005.*

If a lobbyist employer terminates a contract with a lobbying firm and there remains a dispute over payment of fees, or the lobbying firm fails to terminate the lobbyist employer after the employer instructs the firm in writing to do so, the lobbyist employer may file a Form 606, but must file a Form 635 at a later date if additional payments are made to the lobbying firm as a result of the dispute.

Lobbyists and lobbying firms remain subject to the \$10 gift prohibition for six months after ceasing lobbying activity.

Notice of Withdrawal, Form 607

Individuals who have filed a Lobbyist Certification Statement, Form 604, or persons who have filed a Lobbying Firm Registration Statement, Form 601, but, in fact, never met the definition of lobbyist or lobbying firm may file a Notice of Withdrawal, Form 607 to terminate reporting obligations. This form may not be used to terminate filing obligations of a person who has qualified as a lobbyist or lobbying firm.

Individuals who filed a Form 604, but never met the definition of lobbyist, are not subject to the \$10 gift prohibition once the Form 607 is on file with the Secretary of State's office.

Chapter 3 — Registration and Termination

The following chart summarizes several common situations that result in the filing of registration and/or amendment statements. Quarterly disclosure statements are also required of lobbying firms, lobbyists, and lobbyist employers.

Situation	Registration Requirement	Deadline
Entity qualifies as lobbyist employer by retaining an existing lobbying firm.	Firm files 605, attaches 602 signed by lobbyist employer.	Before the firm engages in direct communication.
Entity qualifies as lobbyist employer by employing an in-house lobbyist.	Lobbyist employer files 603, attaches 604 signed by lobbyist.	Within 10 days of qualifying as a lobbyist employer.
Entity qualifies as a lobbying firm by contracting with a lobbyist employer.	Firm files 601, attaches 602 signed by lobbyist employer.	Within 10 days of qualifying as a lobbying firm.
Lobbying firm A subcontracts a client to Lobbying firm B.	Firm B files 605 and attaches a 602 signed by Firm A. No registration requirement for the client.	Before Firm B lobbies for the client.
Lobbyist changes employment. Leaves lobbyist employer to work for existing lobbying firm.	Employer files 605 – no attachment. Firm files 605, attaches 604 signed by lobbyist (fee required).	Within 20 days of the effective date.
Lobbying firm stops lobbying for a client. Client does not employ a lobbyist.	Firm files 605. No termination requirement for client.	Within 20 days of the effective date.
Lobbying firm stops lobbying for a client. Client then employs an in-house lobbyist.	Firm files 605. Lobbyist employer files 603, attaches 604 signed by lobbyist (picture & fee required).	Within 20 days of the effective date.
Lobbyist employer with an in-house lobbyist renews registration.	Employer files 603, attaches 604 signed by lobbyist (picture & fee required).	Between November 1 and December 31 of each even-numbered year.
Lobbying firm renews registration.	Firm files 601, attaches 602 signed by each client and 604 signed by each lobbyist (picture & fee required).	Between November 1 and December 31 of each even-numbered year.

Statutory and Regulatory References

Statutes

- 8956 *Ethics Training Courses*
- 86100 *Registration*
- 86101 *Registration; Time*
- 86102 *Registration Fees*
- 86103 *Lobbyist Certification; Requirements*
- 86104 *Lobbying Firm; Registration Requirements*
- 86105 *Lobbyist Employer; Registration Requirements*
- 86106 *Renewal of Registration*
- 86107 *Registration Statement; Amendment; Termination*
- 86108 *Registration Statement; Publication*
- 86109 *Directory of Lobbyists, Lobbying Firms, and Lobbyist Employers*
- 86109.5 *Directory of Lobbyists, Lobbying Firms, and Lobbyist Employers; Online Version*
- 86118 *Lobbying Reports; Where to File*

Regulation

- 18601 *Withdrawal of Lobbyist Certification or Lobbying Firm Registration*